

Title IV, Part A Performance Review Self-Assessment

As a recipient of Title IV, Part A grant funds from the U.S. Department of Education (USED), the Kentucky Department of Education (KDE) is required to conduct compliance reviews to ensure that school districts use funds in accordance with the authorizing statute. The objectives of the reviews are:

- To assess the degree to which program requirements are being fulfilled and make recommendations when appropriate; and
- To provide technical assistance and guidance to strengthen program administration and quality.

For monitoring, the areas of review will include: (1) program development, implementation and evaluation; (2) financial management; and (3) participation of private schools. Program records and supporting documentation must be made available for review and each monitoring indicator lists sample documentation that may be provided. Please note the sample documentation listed is not an all-encompassing list, as other forms of evidence may be provided.

Instructions: Please respond to each self-assessment question. For items requesting a brief response, please provide a narrative answer or submit responsive documentation and indicate in the response (a) the document(s) that are responsive to each question, and (b) the specific page or pages of the relevant documents that address each question. Please include each document file name in the “Submitted Documentation File Name(s)” column. In some cases, the same document may be responsive to multiple questions. In that case, you can submit the documentation once and refer to it in multiple questions (including page numbers for each section, as relevant).

I. Program Development, Implementation and Evaluation

Requirement	District Response	Submitted Documentation File Name(s)
<p>A. STAKEHOLDER CONSULTATION All required stakeholders were consulted in the development and implementation of the district’s Title IV, Part A plan and periodic meetings were scheduled. Required stakeholders include parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives and others with relevant and demonstrated expertise. (ESEA section 4106 (c)(1-2))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Agendas</i> • <i>Meeting minutes</i> • <i>Sign-in sheets (Names and areas of representation should be included for all shareholder groups)</i> • <i>Meeting invitations</i> • <i>Surveys/feedback</i> • <i>Letters/emails</i> • <i>Social media announcements</i> 	<p><i>Enter brief response here</i></p>	
<p>B. NEEDS ASSESSMENT The LEA conducted a comprehensive needs assessment to examine the needs for improvement of access to and opportunities for:</p> <ul style="list-style-type: none"> • A well-rounded education for all students; • School conditions for student learning in order to create a healthy and safe school environment; and • Personalized learning experiences supported by technology and professional development for the effective use of data and technology. (ESEA section 4106(d))	<p><i>enter brief response here</i></p>	

Requirement	District Response	Submitted Documentation File Name(s)
<p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>CSIP/CDIP or other comprehensive needs assessment documents</i> • <i>Meeting dates, minutes and sign-in sheets</i> • <i>Documentation that contributed to the needs assessment (survey results, disciplinary records, course offerings, professional development schedules, etc.)</i> 		
<p>C. ACTIVITY EVALUATION</p> <p>The LEA evaluates the effectiveness of the activities and programs throughout the year based upon the objectives and district's need based upon the comprehensive needs assessment. The district uses the periodic evaluation of data to determine effectiveness and future program planning. (ESEA section 4106(e)(1)(E))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Sample evaluations/activity Evaluation form</i> • <i>District planning documentation</i> • <i>Data review; PLC minutes</i> • <i>Surveys</i> 	<p><i>enter brief response here</i></p>	

II. Financial Management

Requirement	Yes	No	N/A	District Response	Submitted Documentation File Name(s)
<p>A. ALLOCATIONS \$30,000 AND OVER</p> <p>Districts allocated and spent funds in all three sections of the grant with at least:</p> <ul style="list-style-type: none"> • 20% for Well-Rounded Education • 20% for Safe and Healthy Students • A portion for Effective Use of Technology <p>(ESEA section 4106(e)(2)(C-E))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Financial expenditures on detailed MUNIS</i> 				<i>Enter brief response here</i>	
<p>B. APPLICATION AND BUDGET ALIGNMENT</p> <p>School and district staffing patterns and financial expenditures/obligations to date are consistent with the approved Title IV, Part A GMAP application and budget. A separate accounting of Title IV, Part A funds is maintained in the MUNIS system and matches the categories set up in GMAP. (ESEA section 8306; 2 CFR 200.302)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Detailed MUNIS reports</i> • <i>Title IV, Part A approved GMAP budget</i> 				<i>enter brief response here</i>	
<p>C. TIME AND EFFORT REQUIREMENTS</p> <p>The district has written procedures in place for time and effort. These written procedures should include instructions for:</p> <ul style="list-style-type: none"> • The completion of time and attendance reporting; • The approval cycle that is required; 				<i>enter brief response here</i>	

Requirement	Yes	No	N/A	District Response	Submitted Documentation File Name(s)
<ul style="list-style-type: none"> • The processing of personnel charges to federal awards; • The internal review process that will be established to ensure effective internal control over the federal award (2 CFR 200.430(i)); and • The necessary adjustment required so that the final amount charged to the federal award for the salary is accurate, allowable and properly allocated (2 CFR 200.430 (i)(8)). This justification must occur at least annually. <p>The district maintains documentation for any employees paid in full or in part with Title IV, Part A funds to support the allocability, veracity and accuracy of the work performed. (2 CFR 200.430 (i))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Written time and effort procedures for how the district will ensure that personnel charges to federal awards are accurate, allowable and properly allocated, including a process for after-the-fact review of interim charges made to the federal award based on budget estimates.</i> • <i>Documentation to support the allocability, veracity and accuracy of the work performed for all employees paid in whole or in part with Title IV, Part A funds. Signed, dated semi-annual certification and/or monthly PAR reports, or another prior</i> 					

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<p><i>KDE-approved documentation system, should be provided. (Note: Payroll charges must match the actual distribution of time recorded.)</i></p>					
<p>D. EQUIPMENT AND SUPPLIES Assets and equipment purchased with Title IV, Part A funds are appropriately tagged and clearly marked. The district has a system in place for marking items purchased with federal funds and disposal of items. (2 CFR 200.313; 2 CFR 200.314)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Inventory records</i> • <i>Reason for disposal and removal from master inventory</i> • <i>Copy of district protocols</i> • <i>Photos or samples of items tagged and labeled</i> 				<i>Enter brief response here</i>	
<p>E. INTERNAL CONTROLS The district maintains adequate internal controls in the disbursement of Title IV, Part A funds. (ESEA section 8306; 2 CFR 200.303)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Procurement policies</i> • <i>Signed invoices</i> 				<i>enter brief response here</i>	
<p>F. SUPPLEMENT/NOT SUPPLANT The district documents that Title IV, Part A funds supplement, not supplant, general funds or programs/activities required by state or local law. (ESEA section 4110 and 8306)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Expenditure reports</i> • <i>Signed assurances</i> • <i>MUNIS report</i> • <i>Board meeting minutes</i> 				<i>enter brief response here</i>	
<p>G. RETENTION REQUIREMENTS FOR RECORDS</p>				<i>enter brief response here</i>	

Requirement	Yes	No	N/A	District Response	Submitted Documentation File Name(s)
<p>All Title IV, Part A records are kept for the current year and three previous years. (2 CFR 200.334)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Board policy</i> • <i>Title IV, Part A records (upon request)</i> 					

III. Participation of Private Schools

Requirement	Yes	No	N/A	Submitted Documentation File Name(s)
<p>A. PRIVATE/NON-PUBLIC SCHOOLS SERVED Are there private/non-public schools being served by Title IV, Part A? (Complete the following if non-public schools exist in the district <u>and</u> have elected to participate). (ESEA section 8501; 34 CFR 76.651) If no is checked, no further action is required for this section.</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>List of participating non-public schools</i> • <i>Letters to non-public schools; evidence of receipt</i> • <i>Declaration of participation</i> 				
<p>B. NON-PUBLIC SCHOOL CONSULTATION The district consulted with participating non-public schools (NPS) and has completed the required Equitable Service Consultation packet. (ESEA section 8501)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Signed and dated consultation packet</i> 				
<p>C. ONGOING COMMUNICATION The district has two-way, ongoing communication with NPS served by Title IV, Part A in order to determine needs of those schools and whether those needs are being met. (ESEA section 8501; 2 CFR 76.652)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Records of consultation meetings (meeting minutes, sign-in sheet, agenda)</i> • <i>Evidence of regular consultation with private school officials (emails, phone call notes, meeting minutes, etc.)</i> 				
<p>D. PROGRAM IMPLEMENTATION The district implements and oversees NPS services. District verifies services provided are allowable and non-ideological. (ESEA section 8501(a)(2))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Consultation agenda</i> • <i>Surveys; consultation form; needs assessments; invoices; evaluation</i> • <i>Invoices for services</i> 				
<p>E. FISCAL OVERSIGHT Expenditures have been made for the non-public school on an equitable basis and in accordance with the consultation packed and approved GMAP application. The district maintains fiscal control over all services provided. (ESEA section 8501; 34 CFR 76.651)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Invoices</i> • <i>Detailed MUNIS</i> • <i>Title IV, Part A GMAP budget</i> • <i>Consultation packet</i> 				
<p>F. EQUIPMENT AND SUPPLIES</p>				

Requirement	Yes	No	N/A	Submitted Documentation File Name(s)
<p>Procedures have been established for the retrieval of Title IV, Part A purchases made on behalf of private schools when the materials are no longer needed for program purposes. The procedures require that retrieved purchases be distributed equitably among participating private schools. (ESEA section 8501(d); 34 CFR 76.661)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Disposal of equipment procedures; inventory logs, photos or samples of items tagged and labeled</i> 				
<p>G. PRIVATE SCHOOL PROGRAM EVALUATION</p> <p>The district evaluates the effectiveness of strategies and activities funded under Title IV, Part A and uses this data to determine future program planning. (ESEA section 4106(e)(1)(E))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Private school needs assessment</i> • <i>Meeting minutes/sample evaluation forms</i> • <i>Data</i> • <i>Surveys</i> 				
<p>I. COMPLAINT PROCEDURE</p> <p>Non-public school and home school officials have been notified of the district's complaint procedure, in the event there is a question of equitability of services. (ESEA section 8501)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Consultation packet</i> • <i>Interview</i> • <i>Copy of complaint procedure</i> 				